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9 *Attorneys for Plaintiff/Counterdefendant*
10 Sky Law Group

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12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 SKY LAW GROUP, a California Professional
15 Corporation,

16 Plaintiff,

17 vs.

18 PAUL PADDA LAW, PLLC, a Nevada
19 Professional Limited Liability Company; and
20 DARSHPAUL S. PADDA, ESQ., an individual,

21 Defendants.

22
23 AND RELATED CLAIMS.

24 Case No. 2:23-cv-01793-CDS-MDC

25 **STIPULATION AND ORDER TO WITHDRAW,
26 WITHOUT PREJUDICE, SKY LAW'S MOTION
TO COMPEL DISCOVERY**

27 Plaintiff Sky Law Group ("Sky Law") and Defendants Paul Padda Law, PLLC ("Padda
28 Law") and Darshpaul S. Padda, Esq. ("Mr. Padda" and together, the "Padda Defendants") stipulate
and agree as follows:

1. On August 14, 2024, Sky Law filed its Motion to Compel Discovery [ECF Nos. 43 &
45] (the "Motion to Compel"). According to Sky Law, it had been preparing this Motion to Compel
for weeks and it reflected meet-and-confer efforts that had spanned months.

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2. After filing the Motion to Compel, on August 21, 2024, the parties received notice of U.S. Magistrate Judge Maximiliano D. Couvillier III's Standing Order & Chambers Practices (the "Standing Order") [ECF No. 46].

3. The Standing Order substantially modifies the normal practice under existing law and rules for resolving discovery disputes. As relevant here, the Standing Order requires the parties to file a “Stipulation Regarding Discovery Dispute” as a condition precedent to any motion to compel (if necessary). Standing Order § II.B.

4. On August 27, 2024, the day before the Padda Defendants' response to the Motion to Compel was due, Mr. Padda contacted Sky Law's counsel and requested that Sky Law withdraw the Motion to Compel, without prejudice, in order to follow the process outlined in the Standing Order.

5. While reserving all rights, Sky Law agrees to withdraw its Motion to Compel so that the parties may follow the discovery dispute process outlined in the Standing Order.

6. By withdrawing the Motion to Compel, Sky Law is not waiving any rights or arguments of any kind, including those raised in the Motion to Compel.

7. The Stipulation Regarding Discovery Disputes, as outlined in the Standing Order, will be filed no later than September 5, 2024.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 28th day of August, 2024.

DATED this 28th day of August, 2024.

BAILEY ♦ KENNEDY

KERN LAW, LTD.
PAUL PADDA LAW, PLLC

By: /s/ *Joshua P. Gilmore*

DENNIS L. KENNEDY
JOSHUA P. GILMORE
TAYLER D. BINGHAM

By: /s/ Paul S. Padda
ROBERT KERN
DARSHPAUL S. PADDA

Attorneys for Plaintiff/Counterdefendant
SKY LAW GROUP

Attorneys for Defendants and Counterclaimant
PAUL PADDA LAW, PLLC and
DARSHPAUL S. PADDA, ESQ.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 08-30-24